

# Los Alamos National Laboratory

Risk Reduction  
and  
Environmental Stewardship Division

## Quality Management Plan

for the

Solid Waste  
Regulatory Compliance Group  
(RRES-SWRC)

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## General Information

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## General Information, continued

**Appendices** This plan has the following appendices:

<b>Number</b>	<b>Appendix Title</b>	<b>No. of pages</b>
A	RRES-SWRC Organization Chart	1
B	RRES-SWRC Quality Assurance Project Plans, Quality Procedures, and Standard Operating Procedures	2
C	Acronyms	1
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**History of revision**

This table lists the revision history of this plan.

<b>Revision</b>	<b>Date</b>	<b>Description of Changes</b>
0	06/15/01	New document
1	09/30/02	Revised to reflect new group name and to update QA process and procedures

## **Section 1**

### **Quality Program**

#### **Organization**

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**Introduction** This plan specifies how the Solid Waste Regulatory Compliance Group (RRES-SWRC) conducts its business to maintain compliance with federal and state laws, regulations, and requirements concerning solid waste generated at Los Alamos National Laboratory (LANL or the Laboratory). This plan also provides for conducting work in a safe and secure manner.

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**Group mission** RRES-SWRC establishes, champions, and executes its role as the Laboratory's official voice for compliance with federal and state environmental protection regulations by providing support to line organizations for compliance with solid waste, underground storage tanks, and polychlorinated biphenyls (PCBs) rules, regulations, and Department of Energy (DOE) orders. Compliance activities include:

- Interpretation and application of current regulations;
- Assistance and direction in complying with regulations;
- Collection, analysis, and transmittal of data and other vital information related to regulatory compliance and environmental compliance;
- Submittal of required reports, notices, and permit applications;
- Negotiations with regulatory agencies and stakeholders on permit conditions and compliance orders;
- Maintenance of records and data necessary to meet requirements; and
- Oversight of certain activities.

## Organization, continued

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### Regulatory drivers

The drivers for the development and implementation of programs in RRES-SWRC are the applicable parts of:

- Resource Conservation and Recovery Act (RCRA)
  - Toxic Substances Control Act (TSCA)
  - Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)
  - New Mexico Hazardous Waste Act (NMHWA)
  - New Mexico Solid Waste Act
  - New Mexico Environmental Improvement Act
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### Other drivers

Other drivers for RRES-SWRC include

- University of California (UC) performance measures that require a high degree of compliance and environmental protection.
  - Laboratory Integrated Safety and Security Management (ISSM) principles that provide implementation tools to line management,
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### Organization

The Group Leader, and Deputy Group Leader in the absence of the Group Leader, has line management responsibility and authority for personnel, administration, budget, and operations in RRES-SWRC. Reporting to the Group Leader and Deputy Group Leader, supervisors are delegated authority for budget allocation and for performance assessment input for performance appraisals for RRES-SWRC staff assigned to them. The Group Leader appoints supervisory personnel as needed.

Several RRES-SWRC employees are deployed to host organizations to provide dedicated professional support services.

The current group organization chart is presented as *Appendix A* (RRES-SWRC Organization Chart).

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## Organization, continued

### Implementa- tion

The following table lists specific authorities and roles and responsibilities.

Group Leader/ Deputy Group Leader	<p>The RRES-SWRC Group Leader/Deputy Group Leader is authorized to;</p> <ul style="list-style-type: none"><li>• Work closely with the Risk Reduction and Environmental Stewardship Division Office (RRES-DO) to establish staffing needs, select and hire staff with appropriate technical and/or professional knowledge and abilities; and ensure individuals are appropriately oriented and trained for their assignments.</li><li>• Conduct administrative functions in accordance with Laboratory policy and RRES-DO processes.</li><li>• Propose, negotiate, and responsibly manage funding to sustain operations; authorize expenditures within allocated budgets (direct and indirect); and ensure operation cost effectiveness.</li><li>• Assign and oversee personnel to ensure successful Group operations.</li></ul> <p>The RRES-SWRC Group Leader/Deputy Group Leader has the following roles and responsibilities:</p> <ul style="list-style-type: none"><li>• Ensure all work is performed in a manner that protects the worker, the public, and the environment.</li><li>• Ensure work activities are defined, hazards are identified and effectively mitigated, authorized, and are assessed for lessons learned.</li><li>• Ensure all workers are qualified and authorized to perform specific work assignments.</li><li>• Ensure all work is performed in a manner that protects national security interests.</li><li>• Ensure work activities are defined, security vulnerabilities are identified and mitigated, and lessons learned are assessed.</li><li>• Ensure high quality, technically sound, and cost effective products and services. Determine quality process to ensure formality of operations, clear communication, and continuous improvement.</li></ul>
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Group Leader/Deputy Group Leader, continued	<ul style="list-style-type: none"><li>• Establish and maintain a work environment that involves mentoring, coaching, motivating, and promoting change</li><li>• Ensure effective, efficient, and ethical management of people, time, property, finances, supplies, equipment, and facilities.</li><li>• Represent the Group to internal customers and external organizations (i.e., DOE, regulators, stakeholders, and the public).</li><li>• Participate in strategic and tactical planning processes and ensure established goals and objectives are met.</li></ul>
Other supervisory personnel	<p>Assist the Group Leader in the management and leadership of RRES-SWRC projects.</p> <p>Manage the tasks and staffing of the project in order to deliver the project product(s).</p> <p>Provide first line supervision of personnel assigned to the project.</p> <p>Plan, assign and manage tasks in order to</p> <ul style="list-style-type: none"><li>• Ensure personnel are properly trained for the task.</li><li>• Ensure personnel follow prescribed work procedures and safety guidance.</li><li>• Ensure tasks are completed on schedule, on budget, and meet quality specifications.</li></ul> <p>Communicate with staff and provide guidance and technical problem resolution.</p> <p>Evaluate the productivity and suitability of staff and recommend changes, as needed, to increase the productivity and skill level of staff. Provide input to performance appraisals and salary increases.</p> <p>Communicate with Group Leader on issues that could result in failure to meet project goals or institutional requirements. Document any resulting significant decisions that affect project policy or processes and communicate decisions to project members. Revise appropriate procedures or plans, if necessary.</p>

Who	What
Core personnel	<p>Accomplish the assigned work in a manner that meets quality specifications and meets specified milestone timetables.</p> <ul style="list-style-type: none"><li>• Communicate with supervisor (Group Leader, Deputy Group Leader or Supervisor) on progress of work assignments.</li><li>• Account for the delivery of all work assignments.</li></ul> <p>Bring technical problems with work assignments to the attention of the supervisor (Group Leader, Deputy Group Leader, or Supervisor).</p>
Deployed personnel	<p>Accomplish the assigned work in a manner that meets quality specifications and meets specified milestone timetables.</p> <ul style="list-style-type: none"><li>• Communicate with host organization and RRES-SWRC supervisors (as listed in individual Agreements for Deployed Services) on progress of work assignments.</li><li>• Account for the delivery of all work assignments.</li></ul> <p>Bring technical problems with work assignments to the attention of host organization and RRES-SWRC supervisors.</p>



## RRES-SWRC Quality Management System and Integrated Safety and Security Management (ISSM)

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**RRES-SWRC Policy** RRES-SWRC will meet quality specifications provided in these Quality Management Plan (QMP) procedures. The principles and requirements of ISSM will be integrated in all aspects of the RRES-SWRC-QMP. This integrated quality management system will ensure that work, health, safety, and environmental specifications are met.

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**Document hierarchy** RRES-SWRC follows a system of documented plans and procedures. The RRES-SWRC quality management system consists of the

- Group-level QMP (this document)
- RRES-SWRC Quality Assurance Project Plans (QAPPs) for the RCRA and TSCA Compliance Programs
- RRES-SWRC Quality Procedures (QPs)
- RRES-SWRC Standard Operating Procedures (SOPs)
- RRES-SWRC Hazard Control Plans (HCPs)

ISM expectations and Laboratory Implementation Procedures (LIRs), Laboratory Performance Requirements (LPRs), and Laboratory Implementation Guidance (LIG) documents will be integrated in this document hierarchy at all levels assuring that all work follows the principles of ISSM.

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**Revising and distributing this plan** The Group Leader and a chosen reviewer will approve all revisions to this plan.

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**Quality Assurance Project Plans**

RRES-SWRC will develop and maintain documented QAPPs for all significant compliance programs. RRES-SWRC will follow Environmental Protection Agency (EPA), DOE, or other appropriate guidance to develop QAPPs, depending on the nature of the project work. Regardless of the format selected, RRES-SWRC project plans will fulfill DOE requirements for Compliance Assurance Programs.

See Section 5 *Compliance Assurance Programs*, page 24, for information on how to develop plans.

The QAPPs existing to date are:

- Resource Conservation and Recovery Act Quality Assurance Project Plan (RRES-SWRC-RCRA-QAPP)
- Toxic Substances Control Act Quality Assurance Project Plan (RRES-SWRC TSCA-QAPP)

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**Quality Procedures**

Every RRES-SWRC process of sufficient complexity, that is done repeatedly, is described in a QP, as described in Section 5. Procedures are reviewed and updated on an annual basis. Hazard Control Plans (HCPs) will be written for all work assignments in the Group, as required by ISM and LIR 300-00-01 and LIR 300-00-02.

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**Working with other groups**

RRES-SWRC routinely works in partnership with facility managers, subcontractors, and other Laboratory groups and divisions to achieve our mission. The Group Leader will identify responsibilities and quality assurance requirements for these partners in our QAPPs and QPs or in other Laboratory documents such as LIRs, LPRs, and LIGs. The Group will pass through requirements using a graded approach to scale the level of requirements to the importance or the critical nature of the work or data provided. Such requirements could include record keeping and a complete quality program.

The Group provides deployed RRES-SWRC personnel to provide professional support services to various Laboratory organizations with specific concerns about compliance with solid waste issues. These relationships are formalized in “Agreements for Deployed Services” which are reviewed and revised annually.

**Implementa-  
tion**

The following table lists responsibilities.

Who	What
Group Leader/ Deputy Group Leader	<p>Approve this QMP and all revisions to this plan; choose a reviewer to review all revisions to the QMP.</p> <p>Initiate and review QAPPs and QPs for each significant project performed by the Group.</p> <p>Initiate and review HCPs for each work assignment, following the guidance of LIR 300-00-02 and ensuring that any HCP with a residual risk of Medium is reviewed and signed by RRES-DO.</p> <p>Appoint the RRES-SWRC Safety Coordinator.</p> <p>Conduct monthly management walkarounds for core and deployed personnel.</p> <p>Initiate and review “Agreements for Deployed Services” for personnel deployed to other Laboratory organizations.</p>
Other supervisory personnel	<p>Develop QAPPs and QPs, following appropriate guidance or standards, to prescribe requirements for the project.</p> <p>Ensure quality requirements imposed on other groups or organizations are documented in quality plans or appropriate LIRs, LPRs, and LIGs.</p>

<b>Who</b>	<b>What</b>
RRES-SWRC Safety Coordinator	<p>Review all HCPs in the Group to assure integration of ISM into all work and adherence to the guidance of LIR 300-00-01 and LIR300-00-02.</p> <p>Review all QPs that require authorization to an HCP with a medium residual risk.</p> <p>Participate in a management walk-around at least once a quarter.</p> <p>Investigate and track RRES-SWRC environment, safety, and health (ES&amp;H) incidents and communicate findings to Group and RRES-DO, if necessary.</p>
Procedure preparers	<p>Write QAPPs and QPs that describe implementing procedures and any essential internal and external interfaces with other organizations and their quality programs.</p> <p>Write HCPs that describe all aspects of the work, hazards involved, and hazard controls.</p>

## Section 2

### Personnel Development

#### Personnel Recruitment

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**RRES-SWRC Policy** All Group personnel will be qualified through a combination of education, experience, and training to perform their assigned tasks. The Group will recruit a diverse workforce adhering to the Laboratory personnel system (Human Resources Division) policies and procedures for hiring.

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**Implementation** The following table lists responsibilities.

Who	What
Group Leader/ Deputy Group Leader	Establish and document job descriptions for each position, including education and skills, knowledge, and abilities required.  Review applications and select qualified candidates.  Make final selection of applicants for the job(s).
Laboratory personnel organization	Supply a pool of qualified applicants to the Group.  Hire employees based on the recommendations of project leaders or managers.

## Personnel Training and Professional Development

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**RRES-SWRC Policy** New Group employees will receive orientation and training to meet their respective job duties, responsibilities, and authorities. This orientation will include the principles and expectations of integrating safety into the work of RRES-SWRC. When changes to job assignments are made, re-orientation and training will be conducted as necessary for each employee. Personnel will continue to receive the necessary training to achieve proficiency with job assignments and to ensure that worker health and safety is maintained. Professional development opportunities will be encouraged beyond basic qualification training. Records will be maintained by the Group to document job-specific training. Each new employee must read the HCP and be authorized for Routine Office Work and Driving Government Vehicles or Personal Vehicles on Government Business before they can begin any work assignment for the Group.

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**Implementa-  
tion** The following table lists responsibilities.

Who	What
Group Leader/ Deputy Group Leader	Ensure that new employees receive orientation to their respective responsibilities, authorities, and requirements documents governing the work they perform, according to the RRES-SWRC-SOP, "Personnel Training and Orientation."  Ensure employees have a coordinated training plan according to RRES-SWRC-SOP, "Personnel Training and Orientation."  Make decisions regarding allocation of training and professional development resources.  Review and sign each employee's work authorizations in the HCP suite.
Group Secretary	Maintain the system to track training plans and records according to RRES-SWRC-SOP, "Personnel Training and Orientation."

<b>Who</b>	<b>What</b>
Other supervisory personnel	<p>Ensure that new team members receive orientation to their respective job duties, authorities, and requirements documents governing the work they perform, according to RRES-SWRC-SOP, "Personnel Training and Orientation."</p> <p>Ensure team members receive coaching and/or mentoring for their respective job duties.</p> <p>Ensure that reorientation is conducted, as necessary, to adapt to changes in an employee's assigned work and in requirements governing the work performed.</p> <p>Determine project specific training needs of team members.</p> <p>Ensure that team members receive and document the training required (according to RRES-SWRC-SOP, "Personnel Training and Orientation.")</p> <p>Review team members training plans annually.</p>
Group personnel	<p>Share responsibility with supervisory personnel and Group Leader for identifying and obtaining necessary training.</p> <p>All Group personnel who go into the field to perform field work must be trained to, and comply with, the additional training requirements listed in, RRES-SWRC-SOP, General Field Work." and be authorized to RRES-SWRC-HCP-03, "General Field Work."</p> <p>All Group personnel who visit hazardous and mixed waste storage areas during audits, tours, inspections, and walk-arounds must read, understand, and sign RRES-SWRC-SP-01, "Safety Procedure – Audits, Tours, Inspections, and Walk-arounds."</p> <p>Identify opportunities for professional development.</p> <p>Coach and mentor other employees whenever possible and appropriate.</p>

## Performance Appraisals and Feedback

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**RRES-SWRC Policy** Group management will conduct performance appraisals annually in accordance with Laboratory and RRES Division requirements. In addition to this formal appraisal process, feedback throughout the year is encouraged. This feedback will go beyond individual performance and may address issues such as management performance, personnel development, job satisfaction, etc.

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**Implementation** The following table lists responsibilities.

Who	What
Group Leader/ Deputy Group Leader	Initiate performance appraisal process.  Appoint lead assessors (the Group Leader, Deputy Group Leader, or other supervisory personnel) for drafting performance appraisals for individuals in the Group. Every individual will have a lead assessor for developing the final performance appraisal.
Group personnel	Draft performance appraisal.  Submit information describing all relevant accomplishments during the assessment year to lead assessor.
Lead assessors	Meet with other personnel to discuss process, individual's accomplishments, discussion items, etc., and prepare a lead assessor's worksheet.  Obtain information from employee that includes all relevant accomplishments for projects.  Obtain /resolve comments from other personnel of individual.  Submit performance appraisal to Group Office for review.  Coordinate and perform oral performance appraisal.



<b>Who</b>	<b>What</b>
Group Leader/ Deputy Group Leader	Schedule performance assessment deadlines and deliverables. Manage overall process in the Group. Review and sign all performance assessments. Provide routine feedback to supervisory personnel and Group members throughout the year. This will include both positive feedback and constructive criticism.
Other supervisory personnel	Provide routine feedback to supervised Group members, at a minimum. This will include both positive feedback and constructive criticism.
Group personnel	Provide routine feedback to immediate supervisor on issues of job satisfaction, personal development, and any other issues of concern. This will include both positive feedback and constructive criticism. Request feedback from immediate supervisor whenever clarification of expectations is needed or desired.
Group Secretary	Obtain and file all draft and final performance assessment preparation material in confidential file. Maintain all performance assessment information as confidential.

## Student Program

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**RRES-SWRC Policy** RRES-SWRC will recruit Undergraduate (UGS) and Graduate (GRA) students to obtain technical assistance for long-term commitment (1 to 3 years) with the goal of positive student growth. Recruitment and placement will follow all LANL procedures and policies regarding student hiring. Relatives of RRES-SWRC personnel will not be considered for any student position within RRES-SWRC. All students will have a mentor/supervisor who will assume responsibility for assurance of training.

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**Implementa-  
tion** The following table lists responsibilities.

Who	What
Group Leader\ Deputy Group Leader	Approve student hires.
Other supervisory personnel	Recruit and propose student hires. Document job assignments and orient as a new employee as described in RRES-SWRC-SOP, "Personnel Training and Orientation." Act as mentor/supervisor and assure Laboratory-required training is completed. Assume safety line manager responsibilities and ensure that each student has been authorized to the appropriate HCPs.

## Section 3

### Quality Improvement

#### Continuous Improvement

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**RRES-SWRC Policy** RRES-SWRC subscribes to the principles of problem prevention and continuous improvement. All personnel are encouraged to identify and suggest improvements to all Group processes and activities.

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**Implementa-  
tion** The following table lists responsibilities.

Who	What
Group Leader/ Deputy Group Leader	Ensure that an atmosphere exists that allows employees to suggest improvements and opportunities to prevent problems.  Take appropriate action on suggestions made by employees. Appropriate action may be to implement the suggestion, to pass on to appropriate management, or to explain why it cannot be implemented.  Track any safety issues through the management walk-around system.
Group personnel	Identify opportunities for process improvements, process simplification, health and safety enhancement, environmental protection, or other improvements of the Group's operations.  Discuss such opportunities with supervisory personnel or the Group Leader/Deputy Group Leader.

## Deficiencies and Corrective Action

**RRES-SWRC Policy** Group personnel will take action when a deficiency (failure to meet external or internal requirements in laws, regulations, or requirements documents) is found in the Group. This action may include immediate correction of the deficiency. All deficiencies must be reported according to project requirements, verbally or in writing, to either supervisory personnel or to the Group Leader. Supervisory personnel and Group management will take timely action to correct deficiencies. Supervisory personnel or the Group Leader will document deficiencies and their correction. These data will be used to identify systemic weaknesses in quality management.

**Implementation** The following table lists responsibilities.

Who	What
Group Leader/ Deputy Group Leader	Foster an atmosphere in which deficiencies are reported and corrected.  Ensure deficiencies are documented.  Ensure performance by periodically reviewing deficiencies for trends or systematic problems and implement any appropriate management corrections.
Other supervisory personnel	Ensure that level of deficiency documentation and corrective actions are appropriate by considering how a deficiency: <ul style="list-style-type: none"><li>• Affects completeness, cost, or quality of work</li><li>• Affects project goals, deliverables, or schedules</li><li>• Represents unacceptable equipment or supplies</li><li>• Represents an opportunity for quality improvement.</li></ul> Report relatively serious deficiencies to the Group Leader.  Assign knowledgeable individuals to prepare and implement a correction for the deficiency and ensure that it is adequately evaluated and corrected.
Group personnel	Identify any deficiencies and report them to the Supervisor or Group Leader. Describe how work or products were affected.  Document the deficiency appropriately.

## Section 4

### Group Assessments

#### Management Assessments

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**RRES-SWRC Policy** Management assessments will be planned and implemented periodically to evaluate the integrated quality assurance program implementation. Problems identified during management assessments will be documented, reported to the Group Leader, and promptly corrected. Assessment results will be used to continuously improve the quality and efficiency of management and operations within the Group.

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**Implementation** The following table lists responsibilities.

Who	What
Group Leader/ Deputy Group Leader	Plan and conduct self-assessments of the management of projects within the Group to evaluate the effectiveness of the teams in achieving the Group mission.  Initiate a deficiency report (see Section 3 <i>Deficiencies and Corrective Action</i> , page 20) for deviations from requirements found during the assessment.  Oversee resolution and correction of all problems found during management assessments.
Other supervisory personnel	Participate in Group and project management assessments conducted by the Group Leader.

## Management Walk-arounds

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**RRES-SWRC Policy** RRES-SWRC will comply with the requirements for regular walk-arounds as prescribed in Management Safety Walk-arounds (LIR 307-01-03). RRES Division may impose additional requirements for the conduct and documentation of walk-arounds.

The Group Leader will conduct walk-arounds as appropriate to ensure that workers are performing their duties/work in a safe and security conscious manner. The Group Leader may request other supervisory personnel to conduct walk-arounds of work areas under their responsibility. Work will be evaluated to meet the requirements in the applicable Group QAPP, QP, or SOP, applicable LIRs, and Group HCPs. All walk-arounds will be documented in the Laboratory's walk-around database. The Group deficiency process will be used to document, track, and correct all deficiencies found during a walk-around.

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**Implementa-  
tion** The following table lists responsibilities.

Who	What
Group Leader/ Deputy Group Leader	Conduct regular walk-arounds as needed. Record the performance of walk-arounds in the Laboratory database.

## Independent Assessments

**RRES-SWRC Policy** Independent assessments (audits) will be conducted throughout the Group, as specified by the Group Leader, to verify compliance with external regulatory drivers, LANL requirements, and all aspects of this QMP. To evaluate the effectiveness of the quality program, trained and technically knowledgeable personnel not having direct responsibility for the areas they are assessing will conduct assessments, in accordance with applicable written plans or procedures. The assessor's focus for the assessment will be on improving the quality of the process that leads to the end product.

**Implementa-  
tion** The following table lists responsibilities.

Who	What
Group Leader/ Deputy Group Leader	Approve assessment scope and schedules. Contract with assessors as appropriate.
Other supervisory personnel	Establish and document in the QAPP or QP any periodic or special assessments required by the project or by regulatory drivers. Ensure such assessments are conducted.
Assessors	Provide a written plan and/or procedure for the assessment scope and schedule. Monitor work performance. Identify abnormal performance and potential problem precursors. Identify improvement opportunities. Report results to the level of management that has the authority to effect change. Verify resolution of problems (optional, depending on scope of assessment).

## Section 5

### Documents and Records

#### Compliance Assurance Programs

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**RRES-SWRC Policy** Compliance Assurance Programs or QAPPs will be developed for each major RRES-SWRC compliance area, including the RCRA and TSCA Compliance Programs. The RRES-SWRC-QMP will serve as the upper-level document to all QAPPs and major topics addressed in the RRES-SWRC QMP will be addressed in the individual QAPPs. The documentation for each assurance program is sufficiently detailed to identify the critical work processes required for compliance, the roles and responsibilities for those work processes, and the records required for assurance. Any QAPP that includes environmental data collection will use the EPA data quality objectives (DQO) process to develop data quality requirements. All QAPPs will comply with the content requirements of the LANL Quality Assurance (QA) Management Plan and DOE Order 414.1.

When preparing a QAPP for a program that spans beyond RRES-SWRC control, it will likely require deviations from the format and content. In such instances, documentation of these deviations and the reasons should be provided to the Group Leader prior to implementation of the plan.

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**Implementation** The following table lists responsibilities.

Who	What
Group Leader/ Deputy Group Leader	Determine when a QAPP is required. Review and approve all new and revised QAPPs.



<b>Who</b>	<b>What</b>
Lead project personnel	<p>Prepare a plan for the project to describe its critical or essential elements, including</p> <ul style="list-style-type: none"><li>• QA considerations such as safety and security, document control, records management, project tracking and scheduling, etc.,</li><li>• Specific roles, responsibilities, and goals of the project, and</li><li>• Step by step procedures for accomplishing the goals the project.</li></ul> <p>Use standards appropriate for the project and its customers (DOE Order 414.1 for Laboratory customers, etc.).</p> <p>Sampling and analysis procedures may be written as supplements to the QAPP to describe a sampling system that is common to two or more projects.</p> <p>Annually review the QAPP and make appropriate revisions.</p> <p>If necessary, document any deviations from accepted format and content and provide this documentation to the Group Leader for approval prior to finalizing any plan.</p>

## Quality Procedures (QP) and Standard Operating Procedures (SOPs)

**RRES-SWRC Policy** When processes must be performed in a consistent manner, or when failure to perform a process in a certain manner could result in significant negative impact to a project's quality specifications, a quality procedure (QP) or SOP will be written to govern or control that process.

**Appendix B contains a list of the QPs, and SOPs currently in place at RRES-SWRC.**

**Implementation** The following table lists responsibilities.

Who	What
Group Leader/Deputy Group Leader	Ensure the process owners annually review all QPs and SOPs, facilitate any needed revisions, and document the annual reviews. Approve all QPs and SOPs.
Lead project personnel	Determine which QPs and SOPs are to be developed for the project and assign preparers. Approve all QPs and SOPs applicable to their project.
Procedure preparers	Ensure that QPs and SOPs comply with Laboratory requirements to evaluate the safe operating conditions for an operation, when required, and include environment, safety, and health considerations of the operation by including all the HCPs that apply to each QP or SOP. Obtain review by appropriate HSR Division safety groups and the RRES-SWRC Safety Coordinator if QP or SOP contains safety-related steps or other safety hazards that require review (see LIR 300-00-01 and LIR 300-00-02). List the training required before an employee may perform the QP or SOP. List the documents that are to be maintained as records and submitted to the records management system as a result of the process described in the procedure or SOP.

## Laboratory Implementation Requirements (LIRs)

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**RRES-SWRC Policy** LIRs, LPRs, and LIGs will be developed when needed (and as approved by the Laboratory) to provide instructions to other Laboratory organizations for submitting required solid waste information to RRES-SWRC, keeping appropriate records, or taking other actions required to ensure Laboratory's compliance with solid waste requirements.

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**Implementa-  
tion** The following table lists responsibilities.

Who	What
Group Leader/ Deputy Group Leader	Review and approve the final draft and forward to appropriate organizations for approval and distribution
Lead project personnel	Follow the appropriate LIR that provides the requirements necessary to draft review and issue a new LIR. Determine, in coordination with the Group Leader, whether the project requires development of one or more LIRs to pass on requirements to Laboratory organizations. Assign personnel to prepare LIRs as needed.
Preparers	Prepare LIRs in accordance with Laboratory requirements.

## Records

**RRES-SWRC Policy** RRES-SWRC will develop and maintain records that document critical processes and compliance with requirements.

**Implementation** The following table lists responsibilities.

Who	What
Group Secretary	Maintain the Group-wide records management system, incorporating the applicable guidance in Group QAPPS and QPs, Laboratory quality management plans, regulatory agency requirements, and DOE Orders. Include in the procedures any requirements for records disposition, storage, and retrievability.  Maintain all records, including sensitive personnel records resulting from Group operations.  Assure records are transferred to the RRES Division satellite records storage area or Laboratory archives in such a manner that they may be easily identified and retrieved.
Group Leader and other supervisors	Ensure that appropriate records that document compliance with critical processes and requirements are preserved.
Group personnel	Determine the records that are critical or essential to prove compliance with a requirement. Submit such records to the records management system. Other records may be submitted at the employee's discretion.
Procedure preparers	When writing QPs, list the documents to be maintained as records and submitted to the records management system as a result of the process described in the procedure. See Section 5 ( <i>Quality Procedures and Standard Operating Procedures</i> , page 26) for more information.

## Document Control

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**RRES-SWRC Policy** RRES-SWRC prepares a variety of time and topic sensitive documents including various drafts of reports, applications, permits, and responses to information requests and compliance orders from regulatory agencies. Often other Laboratory organizations contribute information to these documents. All final drafts must be reviewed and approved by the Group Authorized Derivative Classifier (ADC) for security classification and the Review Officer (RO) for the Unclassified Controlled Nuclear Information (UCNI) classification, as appropriate, before being released from the Laboratory. Documents must also be reviewed by S-7 and issued a publication number.

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**Implementa-  
tion** The following table lists responsibilities.

Who	What
Lead project personnel	<p>Develop a work schedule that includes</p> <ul style="list-style-type: none"><li>• Primary investigators and authors,</li><li>• Assignments and deliverables,</li><li>• Draft and final deadlines, and</li><li>• Review levels required</li></ul> <p>Maintain communication with various investigators and authors to achieve deadlines.</p> <p>Send final draft to ADC/RO reviewers, as required, incorporating the review time into the work schedule.</p> <p>Make any required revisions before transmitting from the Group to S-7 for publication number.</p>
Group ADC/RO reviewer(s)	<p>Review each document submitted in a timely fashion.</p> <p>Submit comments and suggested revisions to lead project personnel as necessary.</p> <p>Submit documentation of review.</p>

## Correspondence Control

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**RRES-SWRC Policy** All external correspondence and internal management memos generated by Group personnel must be transmitted through the Group Office in order to be logged in and tracked for quality purposes. Incoming mail is to be distributed to individual Group members.

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**Implementation** The following table lists responsibilities.

Who	What
Group personnel	Send all external letters and internal memos to the Group Secretary. Provide copies of incoming correspondence to the Group Office for logging and tracking.
Group Secretary	Transfer draft letters and memos to the correct Laboratory letterhead. Assign a reference number for each document using the RRES-SWRC correspondence log database. Obtain appropriate review and signature. Log and track incoming correspondence, including any resulting assignments (action items). Distribute incoming mail to individual Group members. Maintain the master status list of action items created by incoming correspondence as necessary.

## Section 6

### Work Processes

#### Work Planning and Hazard Review

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##### **RRES-SWRC Policy**

RRES-SWRC uses planning processes to define objectives, to identify long-term and short-range goals and operational strategies consistent with Laboratory directives, and to monitor progress towards those goals and objectives.

Work that contributes to achieving the mission of RRES-SWRC will be planned, documented, and tracked. Work planning will be consistent with the principles of ISM, Integrated Safeguards and Security Management (ISSM), and in compliance with LIR 300-00-01 and LIR 300-00-02. All RRES-SWRC personnel must understand and operate within the parameters of Facility Safety Plans, Facility Tenant Agreements, and associated requirements.

A graded approach will be used that considers the scale, complexity, and importance of the work; potential hazards that might be encountered; risk to employee safety; damage to equipment, property, and the environment; required accuracy and precision of data to be collected; and impacts to cost and schedule if rework is necessary. Work will be performed consistent with applicable QAPPs, QPs, Group HCPs, LIRs, and other instructions, which include appropriate technical standards; instruction; ES&H considerations; or other guidelines commensurate with the complexity and risk of the work. No work will be performed without a signed work authorization. The RRES-SWRC Safety Coordinator and Group Leader will review QPs for hazards. Other supervisory personnel will provide first line supervision of personnel assigned to project tasks and ensure work is performed in a safe manner and achieves project quality specifications.

The RRES-SWRC Group Leader will meet with RRES-SWRC personnel deployed to other Laboratory organizations and their host organization supervisors to determine work assignments and related hazards. All applicable HCPs will be documented in the individual Agreement for Deployed Personnel.

**Note to all RRES-SWRC Personnel: Do not perform any work that is not authorized. Authorized work is work for which you have completed training plans and have signed work authorizations.**

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## Work Planning and Hazard Review, continued

**Implementa-  
tion**      The following table lists responsibilities.

Who	What
Group Leader/ Deputy Group Leader	<p>Maintain a set of Group-wide goals and objectives and track progress.</p> <p>Foster an atmosphere in which safety and security awareness is practiced.</p> <p>Appoint the RRES-SWRC Safety Coordinator.</p> <p>Conduct management walkarounds on an as needed basis for both core and deployed personnel.</p> <p>Authorize all work in RRES-SWRC.</p> <p>Negotiate agreements with host organizations for deployed personnel.</p> <p>Ensure safety reviews are conducted (Agreement for Deployed Personnel) for all assigned work not covered in an RRES-SWRC QP.</p> <p>Communicate applicable Facility Tenant Agreement requirements to Group members.</p> <p>Ensure that implementing QPs and SOPs (see Section 5 <i>Quality Procedures and Standard Operating Procedures</i>, page 26) are developed for critical or essential processes.</p>



## Work Planning and Hazard Review, continued

Who	What
Other supervisory personnel	<p>Develop a QAPP or QP according to the requirements for project plans (see Section 5 <i>Compliance Assurance Programs</i>, page 24).</p> <p>Maintain a set of project objectives and track progress towards those objectives.</p> <p>Develop implementing QPs and SOPs (see Section 5 <i>Quality Procedures and Standard Operating Procedures</i>, page 26) for critical or essential processes.</p> <p>Assist the RRES-SWRC Safety Coordinator to implement Safe Work Practices during review of procedures.</p> <p>Provide first line supervision of personnel assigned to project work tasks and ensure work meets quality specifications of the project.</p> <p>Assure all work conducted on the project is authorized.</p> <p>Understand and operate in accordance with applicable Facility Safety Plans and associated requirements.</p> <p>Determine training required to perform the work.</p> <p>Ensure that required training is completed before allowing personnel to perform task.</p>

## Work Planning and Hazard Review, continued

Who	What
RRES-SWRC Safety Coordinator	<p>Coordinate the identification of hazards, development of controls, and assure documentation of hazards and mitigation for all work in RRES-SWRC.</p> <p>Review QPs, SOPs, and HCPs for hazard identification and mitigation.</p> <p>Make recommendations for hazard mitigation.</p> <p>Make recommendations on appropriate hazard level for work authorizations.</p>
Group personnel	<p>Make suggestions on how to improve safety in the workplace.</p> <p>Before initiating work:</p> <ul style="list-style-type: none"><li>• Complete a Work Authorization form, Attachment 1 of RRES-SWRC-QP-040, “Work Safety Review and Authorization.” Be sure you are authorized to do the work.</li><li>• Determine whether an applicable QP exists and become familiar with QAPP and QP requirements.</li><li>• Use only most current copies of QPs for performance of the work, as applicable, and found on the RRES-SWRC homepage. Perform work according to any applicable QP and QAPP requirements.</li><li>• Complete required training for performing the task and document according to RRES-SWRC-SOP, “Personnel Training and Orientation.”</li><li>• If conducting field work, you must be authorized under RRES-SWRC-HCP-03, “General Field Work” and follow the safety and emergency procedures listed in RRES-SWRC-SOP, “General Field Work,”</li></ul>

## Review of New Regulations

**RRES-SWRC Policy** Periodically, RRES-SWRC personnel will review new regulations promulgated by federal and New Mexico solid waste statutes and by DOE Order to determine if they apply to the Group's work.

**Implementation** The following table lists responsibilities.

Who	What
Group Leader/ Deputy Group Leader	<p>Assign employees to review regulatory registers and regulations in order to determine LANL applicability.</p> <p>Ensure timely communication on regulatory and environmental protection information amongst and between Group personnel and managers.</p> <p>Assign employees to develop, distribute, peer review, document and develop appropriate LPRs and LIRs from interpretations of federal and state solid waste regulations.</p>
Designated Group personnel	<p>Review LANL operational changes (HSR-3 project identification database, National Environmental Policy Act [NEPA] documents, requests to establish new waste storage areas, or open requests) to determine applicability of federal and state solid waste regulatory requirements.</p> <p>Determine actions necessary to comply with requirements.</p> <p>Identify permitting or other compliance issues resulting from operational changes. Notify operations and facility personnel of compliance requirements.</p> <p>Identify permitting or other compliance issues and determine actions necessary to comply with federal and state solid waste requirements.</p> <p>Update QAPPs and QPs for new compliance issues and requirements.</p> <p>Ensure timely notification of LANL operations and facility personnel of applicable requirements.</p>

## Environmental Permitting

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**RRES-SWRC Policy** RRES-SWRC will help Laboratory operating entities apply for, negotiate, and comply with solid waste permits and/or letters of authorization required by state and federal statutes. The Group will provide Laboratory operations with solutions allowing maximum operational flexibility while minimizing costs for maintaining compliance.

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**Implementation** The following table lists responsibilities.

Who	What
Designated Group personnel	<p>Assist Laboratory organizations to identify operations at the Laboratory that require solid waste permits or letters of authorization.</p> <p>Follow the appropriate instructions in QPs to ensure permit applications follow prescribed regulatory requirements for content and format.</p> <p>Participate in review of draft permit applications, focusing on technical accuracy, operational flexibility issues, and long-term cost effective permit maintenance, public health impacts, and other environmental concerns.</p> <p>Ensure facility and operating group review of permit application and incorporate relevant comments.</p> <p>Provide LANL with the point-of-contact between operating entities, DOE, and the New Mexico Environment Department (NMED).</p>

## Interactions with Regulators

<b>RRES-SWRC Policy</b>	RRES-SWRC has primary institutional responsibility for all contacts with regulators (i.e., EPA and NMED) for all issues concerning solid waste, polychlorinated biphenyls (PCBs), and underground storage tanks (USTs). All contacts with regulators will be conducted to ensure institutional consistency, effective execution, and appropriate documentation to assure proper tracking and accurate historical records.	
<b>Implementation</b>	The following table lists responsibilities:	
	<b>Who</b>	<b>What</b>
	Group Leader/ Deputy Group Leader	<p>Represent the Group to Laboratory senior management Operations Working Group (OWG) on issues regarding solid and hazardous waste.</p> <p>Assure that all contacts with regulators are conducted to protect the integrity and best interests of the Laboratory and meet all legal and regulatory requirements.</p> <p>Relay communications with regulators to Laboratory senior management.</p> <p>Delegate requisite responsibilities to qualified Group personnel for such activities as permitting, inspections, establishing performance agreements, commenting on regulations, contractual agreements, negotiating performance schedules, and/or compliance issues, etc.</p>
	Designated Group personnel	<p>Represent the Laboratory with regulatory agencies in discussions and negotiations about permitting issues, compliance orders and notices of violation, and requests for supplemental information and notices of deficiency.</p> <p>Communicate with RRES-SWRC Group Leader and Laboratory operating groups about regulatory concerns.</p> <p>Summarize and bring issues to Group Leader for resolution with the Laboratory OWG and regulatory agencies.</p> <p>Provide written documentation to the Group Office on any agreements, contracts, commitments, proposals, etc. (verbal or written) that may impact the Laboratory.</p>
	Group Secretary	Maintain documentation of all transactions with regulators to ensure accurate historical records, consistency, and availability for reference.

## Environmental and Effluent Sampling

**RRES-SWRC Policy** Environmental and effluent sampling and data collection techniques will follow prescribed regulatory requirements, DOE Order guidance, industry standards where possible, and Group and Environmental Restoration (RRES-R) Project (where applicable) QPs and SOPs.

**Implementation** The following table lists responsibilities.

Who	What
Designated Group personnel	<p>Develop DQOs for environmental and effluent and/or waste sampling and data collection (see Section 5 <i>Compliance Assurance Programs</i>, page 24).</p> <p>Ensure environmental measurements are planned and performed following prescribed regulatory requirements; RRES-SWRC QAPPs and QPs, RRES-SWRC-SOP, “Soil Sampling Using Hand Tools,” RRES-R Project SOPs; and DOE Order guidance.</p> <p>Ensure appropriate implementing QPs are developed to prescribe sampling processes.</p>

**NOTE: All Group personnel who perform field work must comply with RRES-SWRC-SOP, “General Field Work,” and be authorized to RRES-SWRC-HCP-03, “General Field Work.”**

## Waste Management

**RRES-SWRC Policy** RRES-SWRC will comply with RRES Division and Laboratory requirements for waste management and minimization, as specified in ESH-QMP-PP-02 (“Waste Management Performance Plan,”) LIR 404-00-01 (“Waste Acceptance, Characterization, and Certification Program,”) LIR 404-00-02 (“General Waste Management Requirements,”) LIR 404-00-03 (“Hazardous and Mixed Waste Regulations for Generators,”) LIR 404-00-04 (“Managing Solid Waste,”) LIR 404-00-05 (“Managing Radioactive Waste,”) and LIR 404-00-06 (Managing PCBs.”) Specific hazards, controls, and waste characterization processes applicable to a process will be evaluated and documented through the HCPs and communicated in the appropriate QP. Supervisors will identify those employees, if any, who are considered waste generators and will ensure that those employees receive required training.

**Implementation** The following table lists responsibilities.

Who	What
Group Leader/ Deputy Group Leader	Ensure full compliance with all Laboratory, state, and federal requirements for waste management.
Other supervisory personnel	<p>Ensure waste issues are properly identified and documented in HCPs and appropriate implementing QPs and SOPs.</p> <p>Identify employees who generate waste and ensure those employees receive required training as waste generators.</p> <p>Ensure that each supervised employee:</p> <ul style="list-style-type: none"> <li>• Understands and complies with waste management requirements as specified in the appropriate QPs and HCPs.</li> <li>• Has been properly trained and follows all applicable regulations and procedures.</li> </ul>

<b>Who</b>	<b>What</b>
Waste generators	<p>Prevent the unnecessary generation of waste.</p> <p>Minimize the generation of waste to extent possible.</p> <p>Properly identify and document waste streams.</p> <p>Segregate low-level, mixed, hazardous, and nonhazardous waste streams.</p> <p>Ensure that waste is packaged, marked, labeled, and stored properly.</p> <p>Comply with the requirements in ESH-QMP-PP-02 and the requirements in applicable facility-specific procedures for waste operations within radiological controlled areas (RCAs).</p>



## Control of Samples

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**RRES-SWRC Policy** Environmental and/or waste samples will be controlled to maintain legally defensible data and to prevent cross contamination or data loss. Requirements for the control and tracking of these samples will be specified in the RRES-SWRC QP-103, “RCRA Compliance Sampling” and the RRES-SWRC Sampling Plan.

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**Implementation** The following table lists responsibilities.

Who	What
Designated Group personnel	<p>Ensure that procedures are developed to describe the following, as appropriate or necessary:</p> <ul style="list-style-type: none"><li>• A sample numbering and labeling system that reliably and legibly identifies samples and items</li><li>• Chain-of-custody requirements</li><li>• Sample holding times</li><li>• Sample volumes required for analyses</li><li>• Sample volumes required for QA purposes</li><li>• Required preservatives</li><li>• Storing and shipping requirements</li><li>• Archiving, records keeping, data management, and sample tracking status</li><li>• Validation, as necessary</li></ul>

## Analytical Data Management

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**RRES-SWRC Policy** All analytical results from environmental, effluent, and/or waste samples are procured from laboratories that endeavor to provide legally defensible, quality-assured data. RRES-SWRC (or RRES-R if they are RRES-SWRC's client for the sampling) specifies the quality requirements and data package deliverables that will enable the Group to defend the data to any outside examination and completely document the circumstances under which it was created. Statements of work for analytical laboratories are complete and maintained.

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**Implementation** The following table lists responsibilities.

Who	What
Designated Group personnel	<p>Ensure appropriate sample analyses are requested.</p> <p>Ensure project DQOs are satisfied by the data quality requirements in the contract.</p> <p>Evaluate and select analytical laboratories to perform analytical work on environmental samples. Conducts or requests periodic formal assessments of all analytical chemistry vendors to demonstrate their capability to perform the work and their compliance with requirements.</p> <p>Require the analytical laboratory to document and maintain successful participation in national performance audit programs such as DOE-AL-SOW or other accredited organizations.</p> <p>Develop and provide complete, written statements of work to the contractor laboratory.</p> <p>Do no subcontracting of samples.</p> <p>Receive and evaluate the data packages for completeness (validation).</p> <p>Ensure data quality requirements of the contract and data deliverables are met.</p> <p>Ensure analytical chemistry data transfer and upload to appropriate database(s), such as the Facility for Information Management, Analysis, and Display (FIMAD).</p>

## Analytical Data Management, continued

Who	What
Designated Group personnel	<p>Ensure the following requirements are passed on to the vendor in the contract and/or statement of work:</p> <ul style="list-style-type: none"><li>• Use only EPA-approved procedures (e.g., 40 CFR Appendix B, Method 114 for radionuclides or SW 846, or regulator-approved alternatives).</li><li>• Complete all analyses pursuant to this RRES-SWRC-QMP and software procedures compliant with EPA (QA/R-5) or DOE (O 414.1 or 10 CFR 830.120).</li><li>• Perform analyses to meet the specifications in the statements of work.</li><li>• Demonstrate timely delivery of data.</li><li>• Demonstrate ability to meet minimum detectable activity (MDA) requirements on each analyte.</li><li>• Document qualifications of all analytical laboratory personnel who will handle RRES-SWRC samples.</li><li>• Possess appropriate DOE, Nuclear Regulatory Commission (NRC) and/or state nuclear material licenses for each isotope.</li></ul>

## Data and Software Management

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**RRES-SWRC Policy** All data essential to meet the specifications of project deliverables will be managed to ensure validity and security. Valid data have been checked for accuracy and meet DQOs. Secure data are protected against loss. Methods of data verification, validation, and security will be described in the QAPPs, implementing QPs, or SOPs. Calculation methods will be documented. Database and application software developed for RRES-SWRC that performs calculations or other significant operations on data used in compliance determination or data used to analyze impacts on the public health or environment will be considered critical software. Critical database and application software will have documentation sufficient to understand the structure, function, and usage of the software.

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**Implementation** The following table lists responsibilities.

Who	What
Designated Group personnel	Ensure that data generated for the project deliverables are valid and secure. Coordinate development of software needs with RRES-SWRC computer programmer. Document all calculation methods of critical work in a QAPP, QP, or SOP. Document the method of data verification, validation, and security in the QAPP or implementing QPs.
Computer Programmer	Identify and maintain a list of critical database and application software used in the Group. Appoint critical database and application software owners. Assure information regarding computer security requirements is communicated on a regular basis to all members of RRES-SWRC. Develop and maintain a computer security procedure.

## Data and Software Management, continued

Who	What
Computer Programmer, <i>continued</i>	<p>Develop methods for preparation of documentation, user guides, and manuals for critical software databases or applications.</p> <p>Provide technical support and data management expertise to users and owners of critical database and application software.</p> <p>Develop and maintain the RRES-SWRC Home Page, presenting HCPs for Group personnel, lists of QAPPs, QPs, SOPs, LIRs, LPRs, and LIGs that must be read by each employee, and new training requirements as they become available.</p> <p>Develop methods for:</p> <ul style="list-style-type: none"><li>• Identifying the latest revision or version of a critical software code.</li><li>• Notifying users of software that a new version is available.</li><li>• Ensuring critical software output is traceable to the software version used.</li><li>• Verifying and documenting that the software performs as intended.</li><li>• Backing up computer network server drives.</li></ul>
Group personal computer users	<p>Back up critical and other significant software and data as appropriate on an RRES-SWRC network drive or on removable media.</p> <p>Process information in accordance with classification levels.</p> <p>Adhere to information and computer security process in accordance with Laboratory and group specific requirements, including using and changing passwords that enhance computer security.</p>

## Calibration and Maintenance of Measuring and Test Equipment

**RRES-SWRC Policy** Measuring and test equipment are devices used to calibrate, measure, gauge, test, or inspect in order to control or acquire data to verify conformance to specified requirements. All RRES-SWRC technical work that depends upon the accuracy of data will be performed using equipment for which the calibration status and limits of accuracy are known and controlled.

**Implementation** The following table lists responsibilities.

Who	What
Designated Group personnel	<p>Use qualified persons and/or organizations to calibrate equipment used in project activities, as necessary. If project personnel calibrate equipment, develop appropriate procedures to control the calibration, maintenance, accountability, and use of measuring and test equipment. Implementing procedures must satisfy the minimum requirements given in the Laboratory Calibration Program (LIR 402-140-01) and in this section and will address:</p> <ul style="list-style-type: none"><li>• Specified intervals for recalibration based on the item's required accuracy, intended use, and frequency of use, item stability characteristics, manufacturer's recommendations, or other conditions affecting performance.</li><li>• Calibration against a traceable reference standard or physical constant that has accuracy commensurate with the desired tolerance.</li><li>• Records keeping for in-house calibrations or for instruments verified before use.</li><li>• Labeling of the equipment to indicate its calibration status and reference to calibration procedure.</li><li>• Laboratory requirements for calibration given in the Laboratory Calibration Program.</li></ul>

## Calibration and Maintenance of Measuring and Test Equipment, continued

Who	What
Designated Group personnel	Observe calibration status labels or stickers. Do not use equipment that is past its calibration interval and notify the Laboratory Measurement Technology Group or responsible operator (e.g., HSR-4) for recalibration.  Initiate a deficiency report whenever an uncalibrated instrument or equipment has been used to collect data.

## Off-Normal Events

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### RRES-SWRC Policy

When significant off-normal events are detected, key members of the Group will be notified as soon as practical in order to determine if actions necessary to address the event require any notifications and/or approvals, implementation of contingency plan(s), development of special work permits, etc., and to provide support for any of these actions.

Off-normal and emergency events include injuries, accidents, elevated environmental measurements, unplanned detonations or burns of unstable material, leaking or compromised gas cylinders, puncturing of bulging containers, and chemical or radiological spills inside or outside of buildings.

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### Implementa- tion

The following table lists responsibilities.

Who	What
Group Leader/ Deputy Group Leader	Notify all Group members via e-mail when an off-normal environmental measurement is detected.
Off-normal and Emergency Event Responder	Notify RRES-SWRC Group Leader and other Laboratory groups that may have interest in the off-normal event. Notify NMED representatives, if necessary. Notify upper management. Notify DOE Implement notification and reporting requirements of the SOP for Emergency Destruction of Unstable Chemicals (10/15/92) as necessary and applicable ( <i>see Appendix D</i> ). Provide support for development of documentation necessary to resolve event.



## Maintenance

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**RRES-SWRC Policy** Some equipment, including vehicles and field equipment, that is critical to meeting the quality specifications of RRES-SWRC, requires a preventive maintenance program. Preventive maintenance programs will be established taking into consideration operational economics and safety concerns, including the hazard consequences of equipment failure, and the value of lost time and equipment weighed against preventive maintenance costs.

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**Implementation** The following table lists responsibilities.

Who	What
Designated Group personnel	Use qualified personnel and/or organizations to perform preventive maintenance. Follow all Laboratory and RRES Division protocols regarding maintenance. Respond to notices reminding of routine maintenance by taking vehicles in to General Service Administration (GSA) for servicing. Take vehicles in for servicing if any problems arise between routine maintenance.

## Safeguards and Security

**RRES-SWRC Policy** RRES-SWRC will manage information, property, equipment, and according to the requirements of the LANL Materials Management Manual (Chapter 8 of the Laboratory Manual) or its successor.

**Implementa-  
tion** The following table lists responsibilities.

Who	What
Group Leader/ Deputy Group Leader	Appoint a sufficient number of ADCs and ROs to protect and oversee classified information by reviewing pertinent documents prepared by the Group.
RRES-DO Property Administrator	Track, label, and record locations for all Group-controlled property and capital equipment by following the requirements specified in the Laboratory property management manual.  Conform to Laboratory policies and guidelines on key/core requirements.
Group personnel	Notify the Division Property Administrator when controlled equipment is moved or relocated to another room or building.  Assure appropriate levels of property protection such as classification requirements, fire protection, and property accountability.  Ensure assigned property and keys are appropriately controlled and protected.  Ensure information and computer security by using password protection on all machines and programs.  Handle and process information (hard copy or computerized), including publications, in accordance with classification levels.  Participate in internal and external assessments, audits, and reviews of potential fraud, waste, and abuse.  Maintain current computer security training.  Use ADCs to ensure protection of classified information. Use ROs to ensure protection of UCNI information.  Ensure adequate time is provided for ADCs, ROs and any other classification reviews of documents.
Computer Programmer	Implement computer security plans.

## Laboratory and Field Notebooks

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**RRES-SWRC Policy** Properly maintained laboratory and field notebooks have significant scientific, legal, and administrative value and are therefore considered a necessary part of the technical activities of the Group. Work recorded in a notebook or logbook will document who did the work, where, and when, described in sufficient clarity and detail that another person with equivalent training and experience can understand or duplicate the work.

Notebooks generated to record Laboratory-sponsored laboratory or field work are the property of the Laboratory and shall not be removed from the Group if an employee leaves the Group.

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**Implementation** The following table lists responsibilities.

Who	What
Group personnel	Maintain adequate documentation of work in sufficient detail to prove authorship, authenticity, and originality. Submit records to Group Secretary for filing and/or archiving, as appropriate. Submit copies of the notebook pages and submit the completed logbooks to the RRES-R's Record Processing Facility, if appropriate.

## **Section 7**

### **Procurement**

### **Procurement**

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**RRES-SWRC Policy** Procurement of items used in RRES-SWRC will follow the Laboratory process for procurement.

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**Implementation** The following table lists responsibilities.

<b>Who</b>	<b>What</b>
Designated Group personnel	Select suppliers based on evaluation of ability to supply products or services, which meet project requirements. Ensure procurements follow Laboratory prescribed requirements.
Division BUS representative	Ensure procurements are completed expeditiously and accurately. Keep RRES-SWRC Technical Representative informed of any invoice or contractual issues that need to be resolved.

## Section 8

### Inspection and Acceptance Testing

#### Inspection and Acceptance Testing

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**RRES-SWRC Policy** RRES-SWRC will perform appropriate inspections and tests on items critical to the quality of RRES-SWRC processes. Any required inspections and tests will be specified in project plans or implementing procedures.

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**Implementa-  
tion** The following table lists responsibilities.

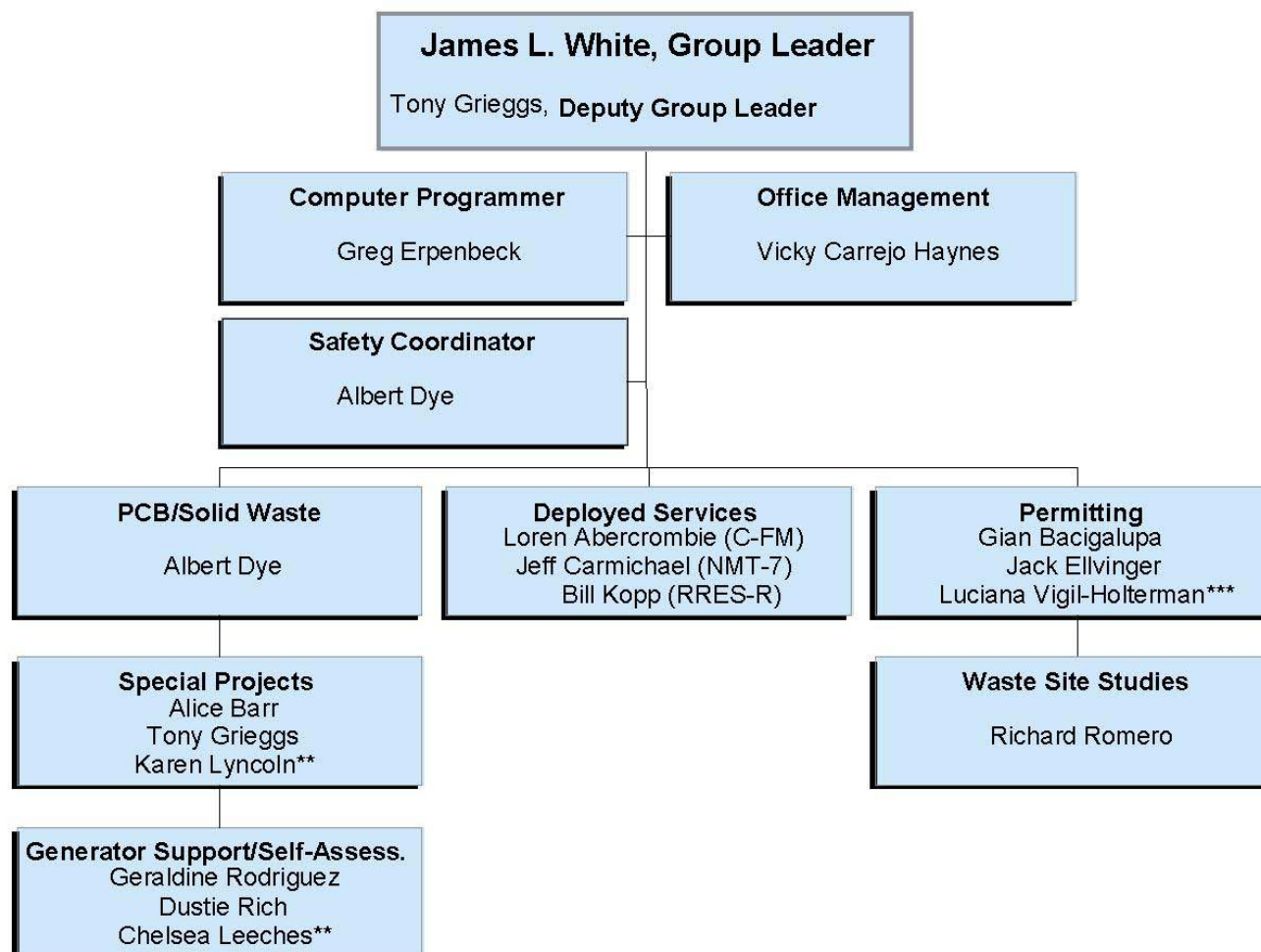
Who	What
Designated Group personnel	Ensure that QAPPs and QPs identify the items that require testing or inspection, the Group or project personnel to perform the inspection, methods and equipment to be used, and the level of documentation required.  Establish procedures providing for inspections that meet the requirements of the Laboratory QA Management Plan.  Ensure that standards and measuring and test equipment used to verify acceptability are calibrated and controlled according to Section 6 ( <i>Calibration and Maintenance of Measuring and Test Equipment</i> ), page 46.



## Appendix A

### RRES-SWRC Organization Chart

# Solid Waste Regulatory Compliance







## ***Appendix B***

### **RRES-SWRC Quality Assurance Project Plans, Quality Procedures, and Standard Operating Procedures**

#### **RRES-SWRC-QMP, “Quality Management Plan**

RRES-SWRC-QP-010, “Preparation of the Annual Environmental Surveillance Report”

RRES-SWRC-QP-020, “Records Management”

RRES-SWRC-QP-030, “Document Distribution”

RRES-SWRC-QP-040, “Work Safety Review and Authorization”

#### **RRES-SWRC-RCRA-QAPP, “Resource Conservation and Recovery Act Quality Assurance Project Plan”**

RRES-SWRC-QP-101, “Responding to the New Mexico Environment Department”

RRES-SWRC-QP-102, “Developing a RCRA Permit application and/or Renewing the RCRA Hazardous Waste Facility Permit”

RRES-SWRC-QP-103, “RCRA Compliance Sampling”

RRES-SWRC-QP-104, “Municipal Waste Profile Form Review”

RRES-SWRC-QP-105, “Escorting Regulatory Inspectors”

RRES-SWRC-QP-106, Reserved

RRES-SWRC-QP-107, “Preparing the Biennial RCRA Hazardous Waste Report”

#### **RRES-SWRC-TSCA-QAPP, “Toxic Substances Control Act Quality Assurance Project Plan”**

RRES-SWRC-QP-201, “Sampling PCB-containing Materials/Wastes”

RRES-SWRC-QP-202, “PCB Records Management”

RRES-SWRC-QP-203, “Review of Waste Profile Forms”

RRES-SWRC-QP-204, “PCB Annual Report/Annual Document Log”

RRES-SWRC-QP-205, “TA-54, Area G PCB Compliance Monitoring”

RRES-SWRC-QP-206, “TA-54, Area G PCB Disposal Reauthorization”

RRES-SWRC-QP-207, “TSCA Import/Export Reviews”

RRES-SWRC, “Sampling Plan,” Rev 2, October 2002

RRES-SWRC-SP-01, “Safety Procedure – Audits, Tours, Inspections, and Walkarounds.”

RRES-SWRC, SOP, “Personnel Training and Orientation”

RRES-SWRC, SOP, “General Field Work”

RRES-SWRC, SOP, “Soil Sampling Using Hand Tools”

RRES-SWRC, SOP, “HazCat Kit Operations”

RRES-SWRC, SOP, “Conducting Self Assessments in Support of FY03 Performance Objectives and Performance Measures (NMHWA, NMSWA, RCRA, TSCA/PCB, UST)”

**RRES-SWRC Hazard Control Plans**

RRES-SWRC-HCP-01, "Routine Office Work"

RRES-SWRC-HCP-02, "Driving Government Vehicles or Personal Vehicles on  
Government Business"

RRES-SWRC-HCP-03, "General Field Work"

RRES-SWRC-HCP-04, "Pre-audits, Audits, and Assessments"

RRES-SWRC-HCP-05, "Sampling"

RRES-SWRC-HCP-07, "Sample Analysis"

## ***Appendix C***

### ***Acronyms***

ADC	authorized derivative classifier
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
DOE	Department of Energy
DOE-AL-SOW	DOE, Albuquerque Area Office, Model Statement of Work for Analytical Services
DQO	data quality objectives
EPA	Environmental Protection Agency
ES&H	environmental, safety, and health
FIMAD	Facility for Information Management, Analysis, and Display
GRA	graduate research assistant
GSA	General Services Administration
HCP	hazard control plan
HSR-3	Integrated Risk Analysis, Management, and Communication Group
HSR-4	Health Physics Measurement Group
ISM	integrated safety management
ISSM	integrated safety and security management
LANL	Los Alamos National Laboratory
LIR	Laboratory Implementation Guidance
LIR	Laboratory Implementation Requirement
LPR	Laboratory Performance Requirements
MDA	minimum detectable activity
NEPA	National Environmental Policy Act
NMED	New Mexico Environment Department
NMHW	New Mexico Hazardous Waste Act
NMSWA	New Mexico Solid Waste Act
NRC	Nuclear Regulatory Commission
OWG	Laboratory Operations Working Group
PCB	polychlorinated biphenyls
QA	quality assurance
QAPP	Quality Assurance Project Plan
QMP	Quality Management Plan
RCA	radiation controlled area
RCRA	Resource Conservation and Recovery Act
RO	review officer
RRES	Risk Reduction and Environmental Stewardship Division
RRES-DO	RRES-Division Office
RRES-R	Environmental Restoration Project
RRES-SWRC	Solid Waste Regulatory Compliance Group
S-7	Classification Group
SOP	standard operating procedure
SP	safety procedure
TSCA	Toxic Substances Control Act
UC	University of California
UCNI	unclassified controlled nuclear information
UGS	undergraduate student
UST	underground storage tank



## ***Appendix D*** **References**

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